

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

UNIVERSAL ENTERTAINMENT  
CORPORATION, UE RESORTS  
INTERNATIONAL, INC. f/k/a OKADA  
MANILA INTERNATIONAL, INC. and  
TIGER RESORT, LEISURE AND  
ENTERTAINMENT, INC.,

Plaintiffs,

v.

ALEXANDER EISEMAN, ZAMA  
CAPITAL ADVISORS LP, ZAMA  
CAPITAL STRATEGY ADVISORS LLC,  
ZAMA CAPITAL MASTER FUND, LP, and  
CHRISTIAN LITTLEJOHN

Defendants.

Case No. 23-CIV-2250 (LGS)

**DECLARATION OF ANIL MAKHIJANI IN SUPPORT OF MOTION, PURSUANT TO  
FED. R. CIV. P. 9(b), 12(b)(1), AND 12(b)(6), OF DEFENDANTS ALEXANDER  
EISEMAN, ZAMA CAPITAL ADVISORS LP, ZAMA CAPITAL STRATEGY  
ADVISORS LLC, ZAMA CAPITAL MASTER FUND, LP AND CHRISTIAN  
LITTLEJOHN TO DISMISS FIRST AMENDED COMPLAINT**

I, Anil Makhijani, pursuant to 28 U.S.C. § 1746 and upon penalty of perjury declare as follows:

1. I make this declaration based on my personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I am an attorney-at-law at the law firm of Quinn Emanuel Urquhart & Sullivan, LLP.

3. I submit this declaration in support of the Motion, Pursuant To Fed. R. Civ. P. 9(b), 12(b)(1), and 12(b)(6), of Defendants Alexander Eiseman, Zama Capital Advisors LP, Zama Capital Strategy Advisors LLC, Zama Capital Master Fund, LP and Christian Littlejohn to Dismiss First Amended Complaint (the “**Motion**”) filed simultaneously herewith.

4. Attached as **Exhibit 1** is a true and correct copy of an email exchange between Toji Takeuchi and Alexander Eiseman between January 27, 2021 and February 4, 2021.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed this 23th day of June, 2023.

Executed on June 23, 2023.

/s/ Anil R. Makhijani  
Anil R. Makhijani

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of June 2023, I caused a copy of the foregoing Declaration to be filed with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Anil Makhijani  
Anil Makhijani

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Zama Capital Advisors LP, Zama Capital Strategy  
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Christian Littlejohn*